

Exhibit C

Schwartz, Barbara

From: Goldberg, Seth A.
Sent: Saturday, October 24, 2020 8:12 AM
To: Adam Slater; Layne Hilton
Cc: Priselac, Jessica; Schwartz, Barbara; Hill, Coleen W.; Hajavi, Yalda
Subject: ZHP Party Depositions

Adam and Layne,

It was not clear to us who is taking the lead for you in talking about the ZHP party depositions, including the 30(b)(6) notice. Layne let us know when we spoke with her on Tuesday that she would be following up to schedule another call. During our discussion about the deposition protocol the 30(b)(6) notice came up, and I mentioned to Adam the possibility of discussing depositions on Monday at 1:00 or 3:00. However, our team is not available Monday. If you would like to propose a few times for the upcoming week, please do.

Seth

